

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

**RACHEL RAMSBOTTOM, and )  
ALEXIS BOWLING, )  
JENNA HOUSTON, )  
JANE DOE #1, )**

**Plaintiffs, )**

**v. )**

**LORIN ASHTON, AMORPHOUS )  
MUSIC, INC., BASSNECTAR )  
TOURING, INC., REDLIGHT )  
MANAGEMENT, INC., C3 PRESENTS, )  
L.L.C, INTERACTIVE GIVING FUND, )  
GNARLOS INDUSTRIES, LLC, )  
CARLOS DONOHUE, ABC )  
CORPORATIONS, ONE THROUGH )  
TEN (said Names Being Fictitious), )**

**Defendants. )**

**CIVIL ACTION NO. 3:21-cv-00272**

**JURY TRIAL DEMANDED**

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**UNOPPOSED MOTION FOR LEAVE TO FILE A REPLY IN SUPPORT OF MOTION  
TO RECONSIDER AND TO EXCEED PAGE LIMITATION**

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Defendants Lorin Ashton, Amorphous Music, Inc., and Bassnectar Touring, Inc. (collectively, the “Bassnectar Defendants”), by and through their attorneys, respectfully submit this Motion for Leave to File a Reply in Support of their Motion to Reconsider the Order Granting the Motion for Leave to Proceed Under Pseudonym and for Protective Order and to exceed the page limitation found in Local Rule 7.01(a)(4). In support of their Motion, the Bassnectar Defendants state as follows:

1. On Friday, May 7, 2021, Plaintiffs filed their Motion for Leave to Proceed Under Pseudonym and For Protective Order and Memorandum in Support (Dkt. 24) (“the Motion”).
2. On Monday, May 10, 2021, before any of the defendants filed their responses, the Court granted the Motion. (Dkt. 25.)

3. On Tuesday, May 11, 2021, the Bassnectar Defendants filed a Motion to Reconsider the Order Granting the Motion for Leave to Proceed Under Pseudonym and for Protective Order (“Motion to Reconsider”) (Dkt. 26) and a Memorandum in Support (Dkt. 27).

4. The next day, the Court ordered Plaintiffs to respond to the Motion to Reconsider on or before May 18, 2021 (Dkt. 31).

5. On May 18, 2021, Plaintiffs filed a Motion in Opposition to Defendant’s Motion to Reconsider along with an accompanying Memorandum of Law in Support (Dkt. 40), and a Declaration of Jane Doe (Dkt. 40-1). In the “Motion” and the accompanying Declaration of Jane Doe, Plaintiffs introduced new materials that none of the Bassnectar Defendants (or any of the other Defendants) have had an opportunity to address.

6. Therefore, the Bassnectar Defendants respectfully request that the Court grant them leave to file a 10-page Reply on or before May 26, 2021.

7. Counsel for the Bassnectar Defendants have conferred with counsel for Plaintiffs pursuant to Local Rule 7.01(a)(1) and can report that the relief requested herein is unopposed so long as the Bassnectar Defendants joined in a motion for oral argument, to which the Bassnectar Defendants agreed.

WHEREFORE, the Bassnectar Defendants respectfully request that the Court enter an order granting them leave to file a 10-page Reply on or before May 26, 2021.

Dated: May 18, 2021

Respectfully Submitted,

s/ Robert A. Peal

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and exact copy of the foregoing was served on the following counsel via the Court's CM/ECF system on this 18th day of May, 2021:

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